

Remarks

Reconsideration of the above-identified application is respectfully requested.

The Examiner has objected to claims 2, 5 and 6 due to certain informalities. In particular, claims 2 and 5 recite "a subsea matable connector", but this term has already been recited in claim 1. Also, the term "the connectors" in claim 6 lacks antecedent basis.

In response to these objections, claim 2 has been amended to define the subsea matable connector as the "second" subsea matable connector. In addition, claim 5 has been amended to define the subsea matable connector as the "third" subsea matable connector. Finally, claim 6, which depends from claim 2, has been amended to define the connectors as the "first and second" connectors.

In light of these amendments, applicants submit that claims 2, 5 and 6 are no longer objectionable.

Claims 1-4, 7-8, 13-18 and 22 stand rejected under 35 U.S.C. 102(b) as being anticipated by Brun et al. (U.S. Patent No. 3,834,460). However, claim 1, on which claims 2-4, 7-8 and 13-18 depend, is clearly not anticipated by Brun. Nevertheless, claim 1 has been amended to more clearly distinguish applicants' invention from this patent.

As shown in Figures 1, 2 and 6, Brun's completion comprises a drill head 8, a suspension chuck 40 which is landed in the drill head 8 and from which are suspended a production string 41 and an annulus pipe 42, a first detachable unit

9 which is connected to the top of the drill head 8, and a second detachable unit 22 which is connected to the top of the first unit 9. The first unit 9 includes first and second valves 18, 19 for controlling flow through the production string 41 and the annulus pipe 42, respectively, and a third valve 17 for controlling flow through a header conduit 21 which is connected to an external union 3. The second unit 22, which is similar to a christmas tree (see column 5, lines 18-20), comprises first and second channels 57, 58 which are connected to the production string 41 and the annulus pipe 42, respectively, a third channel 56 which connects the first and second channels 57, 58 to the header conduit 21 in the first unit 9, and a number of valves for controlling flow through the channels 56, 57 and 58.

With respect to claim 1, Brun fails to disclose a subsea completion which includes a production fluid conduit that is releasably coupled to an external barrier package by a subsea matable connector. Even assuming, as the Examiner apparently asserts, that the first unit 9 is a wellhead, that the second unit 22 is a barrier package and that the union 3 is a subsea matable connector, one can clearly see from Figures 2 and 6 that the header conduit 21 is not connected to the second unit 22 via the union 3. To the contrary, the second unit 22 is connected directly to the top of the first unit 9. Moreover, Brun does not disclose anything connected to the header conduit 21 via the union 3.

Furthermore, Brun does not disclose a barrier package which is spaced laterally from the wellhead. Once again, even assuming that the first unit 9 is a wellhead and that the second unit 22 is a barrier package, the second unit 22 is

clearly not spaced laterally from the first unit 9. To the contrary, the second unit 22 is mounted directly on top of the first unit 9. Consequently, in contrast to the invention recited in claim 1, the components which are supported within the first unit 9 cannot be installed and retrieved independently of the second unit 22. Instead, the second unit 22 must first be removed before the components within the first unit 9 can be installed and retrieved.

Therefore, Brun does not anticipate claim 1. Furthermore, since claims 2-4, 7-8 and 13-18 depend from claim 1, Brun does not anticipate these claims for the reasons stated above with respect to claim 1.

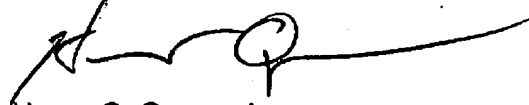
With respect to claim 22, this claim depends from independent claim 21, which has not been specifically rejected. Therefore, applicants submit that claim 22 is allowable.

The Examiner has stated that claims 5, 6, 9-12, 19 and 23-25 would be allowable if they are rewritten in independent form to include the limitations of their base and intervening claims. However, claims 5, 6, 9-12 and 19 depend from claim 1, which applicants maintain is allowable over the prior art cited by the examiner. In addition, claims 23-25 depend from independent claim 20, which has not been specifically rejected. Therefore, applicants submit that claims 5, 6, 9-12, 19 and 23-25 are allowable in their present form.

The prior art made of record but not relied upon has been considered but is not believed to be pertinent to the patentability of the present claims.

In light of the foregoing, applicants submit that claims 1-25 are allowable. Favorable action is solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'H. Query, Jr.', with a long horizontal flourish extending to the right.

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